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Ningbo Bonny e-Home Company Ltd.
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

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10 NINGBO BONNY E-HOME CO.,
LTD.

Case No. 2:24-cv-00568

11 NOTICE OF APPLICATION
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13 Plaintiff,
14 v.
15 ONDWAY, POOLCLEAN US
16 STORE, USA WAREHOUSE,
17 BOWANJIE, INPOOL US STORE,
DEWFOND, DIGIGER,
MOTOBUDDY STORE, and et al.
18 Individual, Partnerships
19 Defendants.
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23 NOTICE OF APPLICATION FOR 1) TEMPORARY RESTRAINING
24 ORDER; 2) ORDER RESTRAINING ASSETS AND STOREFRONTS; AND
25 3) ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION
26 SHOULD NOT ISSUE
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1 Plaintiff now moves this Court for an Order granting their Application for: 1) a
2 temporary restraining order; 2) an order restraining assets and Merchant
3 Storefronts; 3) an order to show cause why a preliminary injunction should not
4 issue. The legal support for this motion is contained in the accompanying
5 Memorandum of Law. The evidence supporting this motion is contained in the
6 Declarations of President Hong and Raymond Chan, and the exhibits attached
7 thereto. A proposed order is filed herewith.

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10 Respectfully submitted,

11 /s/Patricia Ray

12 Attorney for Plaintiff

13 RAYCHAN I.P. LAW FIRM, PLLC

14 Dated: April 25, 2025